

UNITED STATES DISTRICT COURT in NORTHERN DISTRICT OF CALIFORNIA

**Hang Zhang,**

*Plaintiff,*

v.

**DANIEL DRISCOLL,**

**Secretary, Department of the Army,**

*Defendant*

**[PROPOSED] ORDER: MOTION FOR  
PRELIMINARY INJUNCTION  
(AFL-CIO v. OPM, No. 3:25-cv-01780-  
WHA)**

**[PROPOSED] ORDER**

Having considered Plaintiff's Motion for Preliminary Injunction and the supporting materials, the Court GRANTS the motion and ORDERS as follows:

1. Enjoin issuance or reliance on any third marginal performance appraisal pending judicial review;
2. Prohibit any removal or additional reassignment resulting from personnel schemes traceable to OPM's realignment directive;
3. Independently review any future appraisal below pre-2023 levels before implementation;
4. Cease retaliatory actions and internal communications regarding Plaintiff's EEO activities;
5. Submit for in-camera inspection all internal communications about Plaintiff's EEO activity or appraisal processes;
6. Implement safeguards against unauthorized disclosure of Plaintiff's protected EEO information;
7. Remove retaliatory or adverse annotations from Plaintiff's official personnel records;
8. Reinstate Plaintiff's rescinded January 30, 2025 award into her official file;

1 9. Require Defendants to file a compliance report within 30 days detailing implemented  
2 remedial actions;

3 10. Retain jurisdiction for expedited hearing upon allegations of noncompliance.  
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5 IT IS SO ORDERED.

6 Dated: \_\_\_\_\_  
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9 THE HONORABLE WILLIAM H. ALSUP  
10 UNITED STATES DISTRICT JUDGE  
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